

Responsiveness Summary
Technical Guidance Document #12 — Groundwater Monitoring
June 4, 2003

The Department of Environmental Quality received written comments on the draft Technical Guidance Document #12 — Groundwater Monitoring from three interested parties. A total of nine comments and questions are summarized below. DEQ's responses are in ***bold italics***.

1. One commenter asked who will conduct annual well inventories; and is there a standardized form to use.

Response: The owner or operator who is responsible for corrective actions is also responsible for conducting the annual well inventories. DEQ has developed a well inventory form and will include it in the technical guidance document.

2. One commenter asked how would changes in potential receptors be determined, and who's responsibility will it be to notify DEQ when a change occurs?

Response: It is the responsibility of the owner/operator to keep the DEQ informed of new construction in the vicinity of the site's contaminant plume. The DEQ will determine if the new structure is a potential receptor and if additional investigation is warranted.

3. One commenter asked whether this guidance document would become rule or just policy?

Response: Technical Guidance Document #12, Groundwater Monitoring will be published as guidance to assist owners and operators and their consultants to understand DEQ decision-making on long-term monitoring requirements. There are no current plans to publish these guidelines in rule or statute at this time.

4. One commenter questioned the use of the term "applicable standards" in the first paragraph of the document, and suggested the term be more specific.

Response: The document describes monitoring scenarios that are applicable until groundwater contaminants meet cleanup targets. These targets may entail WQB-7 standards and risk-based screening levels. This has been clarified in the document.

5. One commenter said that in cases where the source of a release is unknown, it might be impossible to know that a monitoring well is within ten feet of the source.

Response: The document has been modified to state "the contamination plume must be fully defined and include source wells within 10 feet or less of each contaminant source where possible." This change also addresses situations where source areas are known but cannot be physically accessed.

6. One commenter said that EPH fractions and TEH numbers from the Massachusetts Method should be the only basis for regulating diesel releases; and not EPH screening results.

Response: Generally if there are no beneficial use considerations associated with the groundwater at a site then the DEQ will regulate on the fractions and the TEH concentration because it applies to regulated compounds (aliphatic and aromatic fractions). The DEQ will also take into account (regulate on) the EPH Screen concentration at sites with beneficial use concerns to ensure that current and future beneficial use of groundwater at the site and adjacent properties is protected.

7. One commenter said that laboratory non-detections should not be used for regulatory decisions. DEQ should use WQB-7 standards or RBSLs from Montana's Risk-Based Corrective Action document.

Response: Laboratory non-detections are crucial in delineating the extent of the plume. In cases where water quality results are above non-detect but less than RBSLs, the extent of the plume may not be considered fully defined especially when there are sensitive receptors in the near vicinity. Therefore, non-detects should be used in regulatory decisions with the realization that lab detections and PQLs will vary from lab to lab.

8. One commenter recommended that the document should state that owners and operators could conduct their own monitoring, if they have qualified personnel on their staff.

Response: The document has been modified so owners/operators or responsible parties with their own qualified environmental personnel can conduct their own monitoring.

9. One commenter said that they believe that all potential receptors should be identified, but requirements to investigate them should be made on a case-by-case basis.

Response: The document has been modified to give the DEQ project manager discretion to determine which potential receptors should be investigated.

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